

## **Decision Memo**

### **Non-Commercial Release Project**

USDA Forest Service  
Marlinton White Sulphur Ranger District, Monongahela National Forest  
Greenbrier and Pocahontas Counties, WV

#### **Background**

The Marlinton/White Sulphur Ranger District has been infested with gypsy moths since before 2000, the year when many areas were first heavily defoliated. Suppression treatments with aerial spraying were done in 2001 and 2003 in several locations. The purpose of treatments was to reduce defoliation and gypsy moth populations. Gypsy moth populations are currently low on most of the district, and defoliation has been reduced from previous years as a result of weather and natural enemies. The gypsy moth is considered an “outbreak” pest, whose population can quickly rise to damaging levels, and equally quickly crash to low levels. Damages from high levels of gypsy moth defoliation range from a few dead branches or trees in a stand to complete stand regeneration and multiple years with little or no mast production. Damage can be much more severe when other stress factors, such as drought, are present.

Stands with many oaks are more likely than other stands to be heavily defoliated when populations rise, and such stands are common throughout the area. Within heavily defoliated stands, oak trees that are dominant are more likely to survive defoliation than those that are co-dominant, intermediate or suppressed. Dominant trees have their leaf surface, or crown, above the level of the surrounding trees. Young stands, regenerated less than 15 years ago, are likely to have lower defoliation levels than older stands. Once trees within a stand reach 15 years of age, defoliation levels are likely to be similar to surrounding older stands, but survival of more resilient young trees is likely to be higher.

Young stands included within the project were in, near or adjacent to defoliated areas in 2000, 2001 and 2002. Field visits to each stand in spring of 2003 indicated that young oak trees are present which could benefit by release, in that they are currently co-dominant, and apparently healthy, although signs of past defoliation are present. Other species of trees which could add to stand diversity and resilience if faced by future defoliation by gypsy moths are also present, such as hickory. Butternut trees were not seen, but could be present.

#### **Decision**

I have decided to implement a non commercial release treatment on 300 acres in 20 stands. The work will consist of felling trees and vines which are competing with oak and other diverse overstory trees so that the stand may be less susceptible to expected future gypsy moth defoliation. About 40 trees per acre will be chosen for release based on the tree’s healthy current condition, co-dominant crown position, species susceptibility to gypsy moth and contribution to stand health and diversity. (A table of relative susceptibilities is included in the project file.) Vines may also be cut, but guidelines in Forest Plan Appendix P will be followed to retain

sufficient grape vines for wildlife. No pine trees will be chosen for release, and no butternut trees will be cut. All felled stems will be ten inches or less in diameter. Any larger stems would be girdled instead of being felled. The felling would be accomplished using chain saws, and no ground disturbance would occur. Choices of trees to release will be limited to those that occur in each release area, but mast production potential and a listing of susceptibility to gypsy moths will be used to establish precedence. The Middle Mountain trail adjoins three units for treatment in Compartment 94 and Compartment 63. Any slash or felled trees will be removed from the trail. Slash will not be left on National Forest system roads, public roads or private lands.

Two issues were brought up in public input: a recommendation that 60 crop trees/acre be left, instead of 40; and a concern that oaks may be overtopped in stands over 16 years old especially on good sites, making release of mast producing trees unsuccessful. Although only 40 trees will be selected and fully released, more trees will be left between the chosen trees and will receive incidental release. Only a few of the stands for release are considered to have high site index and field review indicates that some oaks are still co-dominant, and could benefit from release.

The project is located as shown on the attached map, in various locations in Greenbrier County, and two locations in Pocahontas County. Eighty-two acres in four units (Compartment 94 stands 36 and 14 and Compartment 63 stands 54 and 49) are within the Middle Mountain inventoried roadless area. The project involves no construction or reconstruction of roads, nor any timber harvest. It would not affect the roadless values or characteristics that could make the area eligible for wilderness study.

Decisions may be categorically excluded from documentation in an environmental impact statement or environmental assessment when they are within one of the categories identified by the U.S. Department of Agriculture in 7 CFR part 1b.3 or one of the categories identified by the Chief of the Forest Service in Forest Service Handbook (FSH) 1909.15 sections 31.1b or 31.2 as, and there are no extraordinary circumstances related to the decision that may result in a significant individual or cumulative effect on the quality of the human environment.

I have concluded that this decision is appropriately categorically excluded from documentation in an environmental impact statement or environmental assessment as it is a routine activity within a category of exclusion and there are no extraordinary circumstances related to the decision that may result in a significant individual or cumulative effect on the quality of the human environment. My conclusion is based on information presented in this document and the entirety of the Record.

The decision is within category of exclusion 6, under section 31.2 that includes, "Timber stand and/or wildlife habitat improvement activities which do not include the use of herbicides or do not require more than one mile of low standard road construction." No roads will be constructed or reconstructed and no herbicides will be used in the project.

The project areas do not fall within floodplains, wetlands, municipal watersheds, congressionally designated areas, such as wilderness, wilderness study areas, national recreation areas, or research natural areas. The Forest's GIS maps were reviewed on July 19, 2004 in order to make this determination. Project activities are not likely to have more than minimal off-site effects close to the unit boundaries. Some of the units are located on steep slopes, but felling and girdling small trees would result in no soil disturbance and no additional erosion. Since there

would be no ground disturbance on the small, scattered, mostly ridgetop and hillside units, there would be no potential for effects on downstream floodplains. Since there would be no ground disturbance, no impact on cultural resource sites would occur.

Four of the units are within inventoried roadless areas, but the project would have no effect on such areas, as discussed above. Two of these units are located within a Management Prescription 6.2 area, where dispersed recreation is the primary emphasis. Although some trail users may notice the felled trees shortly after the treatment, there would be no potential for significant effects on recreation values. The long term tree health and mast production within the treated stands would be expected to improve, but these improvements would be on small scattered acreage, and would not create a significant change in wildlife populations and numbers, or to recreational values.

No federally listed or proposed for listing threatened or endangered species or designated critical habitat, or Region 9 sensitive species are known to occur in the units designated for release treatment. All proposed units are outside of the Indiana bat 6.3 management prescription areas. Any tree larger than 10" in diameter would be girdled, not felled, to mitigate potential take of an Indiana bat. (Most trees that would fall in this category would be white pines.)

No threatened, endangered, or sensitive plants are known to occur in the treatment areas. These young stands were clearcut 15-25 years ago, during which time the forest floor was disturbed and in an open condition. If any TES plants were present in these stands, they are likely to be tolerant of such harvests and unaffected by the proposed release treatment. Any cumulative effect to sensitive species habitat from the project would be short term and minimal.

Small whorled pogonia is a threatened species which has been found in Greenbrier County on soil similar to some found in and near the project area. This species has been found near recent clearcuts and roads, and can respond favorably to tree canopy openings. Too much shading can be a limiting factor to this species. Butternut is a sensitive species which has similar habitat characteristics and response to shade and openings. If these species are present within the area, the treatment is unlikely to harm them, and could have potential to benefit individuals.

A Biological Assessment was prepared, which documents that the project will have no effect on any Federally listed or proposed threatened or endangered species or designated Critical Habitat. This project will have no negative impacts on species viability nor will it lead to a trend towards federal listing of any species on the Regional Forester's Sensitive Species List. (Robert A. Stovall, 7/20/2004)

No other extraordinary circumstances related to the project were identified.

## **Public Involvement**

A description of the proposal was provided to the public and other agencies for comment during scoping, being posted on the Forest Service website starting on July 3, 2004 until today. In addition, legal advertisements appeared in the *Beckley Herald* and *Pocahontas Times* on July 8 and a letter and maps were mailed to 24 individuals and agencies on July 2. One letter was received in response, from the WVDNR. Issues from this input are discussed above. The input

from the WVDNR consisted mostly of specific guidelines for releasing oaks, which will be used for the project on a site-specific level.

### **Findings Required by Other Laws**

This decision is consistent with the Monongahela National Forest Land and Resource Management Plan. The Management Prescriptions for each stand are 6.1, 3.0 and 6.2, as shown on Map 2. Tree felling is permitted within these management prescriptions to enhance mast production and forest health. In 6.1 areas part of the Desired Future Condition (DFC) is that "Management emphasis will focus on manipulation of the naturally-occurring tree species composition to optimize hard mast production. . ." (Forest Plan, page 165). The DFC within the 3.0 areas is that, "The Forest will be a mosaic of stands of predominantly hardwood trees and associated understories that provide habitat for a variety of wildlife species." (Forest Plan, p. 127) The DFC for the 6.2 areas includes "Natural succession will be the primary vegetative objective, with vegetation management used only to protect the resource or complement the recreational value." (Forest Plan, page 184)

### **Implementation Date**

This decision may be implemented immediately, and is scheduled to begin on or after August 16, 2004.

### **Administrative Review or Appeal Opportunities**

This decision is not subject to administrative appeal.

### **Contact Person**

For additional information concerning this decision or the Forest Service appeal process, contact Jane Bard, the team leader for the analysis. She can be reached at:

Phone: (304) 846-2695  
Mail: Gauley Ranger District  
932 North Fork Cherry Road  
Richwood, WV 26261

### **Signature and Date**

/s/ Rondi L Fischer

RONDI L. FISCHER  
District Ranger

8/10/04

Date